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31 **UNITED STATES DISTRICT COURT**
 32 **NORTHERN DISTRICT OF CALIFORNIA**

33 ANIBAL RODRIGUEZ, SAL CATALDO,
 34 JULIAN SANTIAGO, and SUSAN LYNN
 35 HARVEY, individually and on behalf of all other
 36 similarly situated,

37 Plaintiffs,

38 v.

39 GOOGLE LLC,

40 Defendant.

41 Case No.: 3:20-cv-4688-RS

42 **PLAINTIFFS' DEPOSITION AND**
43 DISCOVERY DESIGNATIONS AND
44 GOOGLE'S OBJECTIONS AND
45 COUNTER-DESIGNATIONS

46 Judge: Hon. Richard Seeborg

47 Trial Date: July 30, 2025

48 Time: 9:00 a.m.

1 Pursuant to the Court's Case Management Scheduling Order entered on January 9, 2025
 2 (Doc. 446) Plaintiffs submit the following deposition and discovery designations, as well as
 3 Google's objections and counter-designations thereto.

4 Attached as Exhibit A is a list of page and line references identifying the deposition
 5 designations.

6 Attached as Exhibit B are excerpts from the deposition of Eric Miraglia referenced in Exhibit
 7 A.

8 Attached as Exhibit C are excerpts from the December 11, 2018 sworn congressional
 9 testimony of Sundar Pichai referenced in Exhibit A.

10 Attached as Exhibit D is a list of page and line references identifying the discovery
 11 designations.

12 Attached as Exhibit E are excerpts from Google's responses to Plaintiffs' interrogatories and
 13 requests for admission referenced in Exhibit D.

14 Dated: August 14, 2025

15 Respectfully submitted,

16 By: /s/ Mark Mao

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